

BEFORE
THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
DOCKET NO. 2018-9-E

| | | |
|--------------------------------|---|--|
| IN RE: |) | |
| South Carolina Electric & |) | |
| Gas Company's |) | |
| Integrated Resource Plan (IRP) |) | |
| |) | PETITION TO INTERVENE AND MOTION FOR ADDITIONAL TIME TO FILE COMMENTS |

Southeast PowerGen, LLC, ("SEPG" or "Petitioner"), through counsel, hereby petitions the Public Service Commission of South Carolina ("Commission"), pursuant to R. 103-825 of the Commission's rules and regulations, to intervene in the above-captioned docket. Petitioner further moves the Commission, pursuant to R. 103-829 of the rules and regulations, to extend the time to file written comments. This Commission established Commission Docket 2018-9-E, on October 4, 2017. South Carolina Electric & Gas Company ("SCE&G") filed its 2018 Integrated Resource Plan ("IRP"), in Docket 2018-9-E, on February 28, 2018.

1. Petitioner is a Limited Liability Company established under the laws of Delaware, with a principal place of business located at 9405 Arrowpoint Boulevard, Charlotte, NC 28273.

2. Petitioner, through its wholly owned subsidiaries, is the owner of multiple power generation facilities located in Georgia aggregating over 2,800 MW of generation capacity. The power from Petitioner's generation fleet is sold at wholesale in the Southeast electricity market.

3. The Southeast electricity market is a market that includes all or parts of Florida, Georgia, Alabama, Mississippi, North Carolina, South Carolina, Missouri and Tennessee. Utilities in the Southeast are vertically integrated and virtually all the physical sales in the Southeast are completed as bilateral transactions.

4. Because SCE&G is proposing through the IRP to construct 1,040 MW of additional generation within the Southeast electricity market in order to meet power demand which may also potentially be supplied by Petitioner's facilities, Petitioner has a significant interest in, and may be materially impacted by, SCE&G's filing and this Commission's review thereof. In addition, due to Petitioner's position as an interested material supplier of power within the Southeast electricity market, with capability to supply demand within the South Carolina electricity market, Petitioner's views should be of substantial interest to the Commission as it assesses the IRP.

5. Petitioner seeks to intervene in this proceeding to advocate for integrated resource planning that evaluates competitive generation alternatives and results in the lowest cost and most efficient electricity supply for consumers.

6. The IRP asserts that the proposed supply plan will enable SCE&G to "*keep its cost of energy service at a minimum since the generating units being added are competitive with alternatives in the market.*"¹

7. The IRP supply plan includes capacity related to two combined cycle plants totaling 1,040 MW. "*The first combined cycle plant is the Columbia Energy Center plant that is expected to become part of SCE&G no later than January 1, 2019. By the winter of 2023, the system will be short of capacity by 200MWs and a second combined cycle is added.*"²

8. The Petitioner's electric generating facilities have the ability to deliver electricity throughout the Southeastern Electric Reliability Council NERC region.³ For example, Petitioner's Effingham facility, an existing highly efficient 511 MW combined-cycle gas turbine electric generating facility located in Rincon, Georgia, is currently electrically interconnected to both Georgia Power's Blandford Road Substation (230 kV) and the Georgia Transmission Corporation's McCall Road Substation (500 kV), and is available now to supply electricity demand identified in the IRP.

9. The IRP process is an important planning tool for SCE&G and the Commission, and a transparent and open process allows for increased sharing of

¹ 2018 Integrated Resource Plan of South Carolina Electric & Gas Company, at 41

² *Id.* at 40

³ The Southeast electricity market encompasses all or part of two NERC regions: the Florida Reliability Coordinating Council and the Southeastern Electric Reliability Council.

information and ideas, which is valuable to all interested parties.⁴

10. The Commission has held that an IRP should establish “*the supplier's or producer's program for meeting the requirements shown in its forecast in an economic and reliable manner, including both demand-side and supply-side options.*”⁵

11. Due to its status as a material wholesale supplier of electricity in the Southeast electricity market, the Petitioner has information highly pertinent to the Commission’s consideration of the IRP, which information should be considered by the Commission in this Docket. This will include information regarding alternative existing sources of power that are available now to supply the electricity demand identified in the IRP, potentially at a cost to South Carolina ratepayers below that contemplated in the IRP.

12. Petitioner has a direct and substantial interest in the decision to be made by this Commission in this Docket pertaining to the competitiveness of supply-side resources and how supply resources affect the cost of electricity for South Carolina consumers.

13. The granting of Petitioner's intervention is (i) contemplated by S.C. Code Ann. Section 58-27-865, et. seq. (Supp. 2016), (ii) in the public interest and (iii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

14. This Petition to Intervene is timely filed with this Commission.

15. Petitioners propose to provide their position on the IRP through written comments and may request an ex parte briefing before the Commission.

16. The Commission has held that public comments must be filed within 30 days after the IRP is posted on the Commission website.⁶

17. On March 26, 2018, the Commission granted the South Carolina Coastal Conservation League’s and Southern Alliance for Clean Energy’s request for a 35-day extension of the comment deadline until May 4, 2018.⁷

18. The Petitioner similarly asserts that the complexity of the issues raised by

⁴ Order 2012-96

⁵ Order 1998-502

⁶ Order 2012-96

⁷ Order 2018-35-H

SCE&G's IRP requires additional time for the thoughtful preparation of comments. Accordingly, the Petitioner respectfully request a 35-day extension of the comment deadline until May 4, 2018.

19. Petitioners are represented by the following counsel in this proceeding:

Roger Hall
Baker, Donelson, Bearman, Caldwell & Berkowitz, PC
1501 Main Street
Suite 600
Columbia, South Carolina 29201
Direct: 803.251.8818
Office: 803.251.8800
Fax: 803.753.0011
Email: rhall@bakerdonelson.com

WHEREFORE, Petitioner prays that it be allowed to intervene and that it be granted an extension of time until May 4, 2018, to submit written comments in this matter.

Respectfully submitted,

s/ Roger P. Hall
Baker, Donelson, Bearman, Caldwell & Berkowitz,
PC
1501 Main Street
Suite 600
Columbia, South Carolina 29201
Direct: 803.251.8818
Office: 803.251.8800
Fax: 803.753.0011
Email: rhall@bakerdonelson.com

Counsel for Petitioner
SC Bar No. 74203

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In the Matter of:)
)
South Carolina Electric & Gas)
Company's Integrated Resource Plan)
(IRP))
_____)

CERTIFICATE OF SERVICE

I certify that the following persons have been served with one (1) copy of **Southeast PowerGen, LLC's Petition to Intervene** by electronic mail at the addresses set forth below:

Matthew W. Gissendanner
South Carolina Electric & Gas Company
220 Operation Way – MC C222
Cayce, SC 29033-3701
Matthew.gissendanner@scana.com

Elizabeth Jones, Counsel
Southern Environmental Law Center
463 King Street, Suite B
Charleston, SC 29403
ejones@selcsc.org

Jeffrey M. Nelson
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
jnelson@regstaff.sc.gov

K. Chad Burgess, Director & Deputy
General Counsel
South Carolina Electric & Gas Company
220 Operation Way - MC C222
Cayce, SC 29033-3701
chad.burgess@scana.com

This the 30th day of March, 2018.

s/ Roger P. Hall